

EC

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Southern District of Ohio

United States of America

v.

Case No. 2:23-mj-517

Anthony Sims
1163 Erickerson Avenue
Columbus, Ohio 43227

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of April 2019 - July 2020 in the county of Franklin in the
Southern District of Ohio, the defendant(s) violated:

*Code Section**Offense Description*

18 U.S.C. §§ 2251(a) and (e) &
2252(a)(4)(B) and (b)(2)

Sexual exploitation of a minor and the possession of child pornography by a
person previously convicted of an offense relating to sexual abuse of a minor

18 U.S.C. § 1591(a)(1) and (b)(1)

Sex trafficking of a minor

This criminal complaint is based on these facts:

See attached affidavit incorporated herein by reference

☒ Continued on the attached sheet.

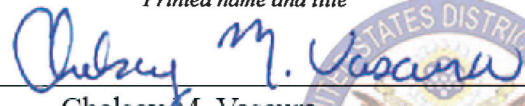
Sworn to before me and signed in my presence.

Date: 9/18/2023City and state: Columbus, Ohio


Complainant's signature

FBI SA Josh Saltar

Printed name and title



Chelsey M. Vascara
United States Magistrate Judge

Judge's signature

Chelsey M. Vascara, US Magistrate Judge

Printed name and title



**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

In the matter of:

United States of America

v.

**Anthony Sims
1163 Erickerson Avenue
Columbus, Ohio 43227**

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Case No.: 2:23-mj-517

Magistrate Judge Vascura

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Josh Saltar (“your affiant”), a Special Agent (SA) with the Federal Bureau of Investigation (FBI), being duly sworn, hereby depose and state:

INTRODUCTION

1. I make this affidavit in support of a criminal complaint to arrest Anthony **SIMS** for violations of 18 U.S.C. §§ 2251(a) and (e) and 2252(a)(4)(B) and (b)(2) - the sexual exploitation of a minor and the possession of child pornography by a person previously convicted of an offense relating to sexual abuse of a minor and 18 U.S.C. § 1591(a)(1) and (b)(1) – sex trafficking of a minor. Since this affidavit is being submitted for the limited purpose of securing a criminal complaint and arrest warrant, your affiant did not include each and every fact known concerning this investigation. Your affiant did not withhold any information or evidence that would negate probable cause. Your affiant set forth only the facts that are believed to be necessary to establish probable cause that Anthony Sims (SIMS) committed the violations listed above.
2. I am a Special Agent (SA) with the Federal Bureau of Investigations (FBI) and have been since October 2014. I am currently assigned to the Child Exploitation and Human Trafficking Task Force, Cincinnati Division, Columbus Resident Agency. I am primarily responsible for investigating internet crimes against children, including child pornography offenses and the online exploitation of children. During my career as a SA, I have participated in various investigations involving computer-related offenses and have executed numerous search warrants, including those involving searches and seizures of computers, digital media, software, and electronically stored information. I have worked with multiple international law enforcement agencies around the world, focusing on cyber-terrorism and terrorist financing through computer intrusions. I have also assisted on various cases and violations, ranging from violent crimes against children and white collar to healthcare fraud, counterintelligence, and counterterrorism. As part of my duties as a Special Agent, I

investigate criminal violations relating to child exploitation and child pornography violations, including the illegal production, distribution, transmission, receipt, and possession of child pornography, in violation of 18 U.S.C. §§ 2251, 2252, and 2252A. I have reviewed numerous examples of child pornography (as defined in 18 U.S.C. § 2256) in all forms of media, including computer media. Prior to joining the FBI, I spent four years working as a civilian Intelligence Specialist for the U.S. Air Force at the National Air and Space Intelligence Center located at the Wright-Patterson Air Force Base, under both the cyber and counterspace squadrons, performing classified intel and reverse engineering duties. During my employment, I have received numerous forensic trainings with the both the Department of Defense and Department of Justice, as well as from private sector security conferences. I have received multiple certifications in Windows, mobile, and memory forensics, as well as incident response and penetration testing, and am certified by the Department of Justice as a Digital Extraction Technician. I received my B.A. from Anderson University in computer science, with a focus on programming, artificial intelligence, and machine learning. As a SA with the FBI, I am authorized to investigate violations of the laws of the United States and to execute warrants issued under the authority of the United States.

PROBABLE CAUSE

3. On July 31, 2020, Columbus Division of Police (CPD) received a call from Witness One, a family member of the three minor victims identified in this case – approximately 13-year-old Minor Victim One (hereinafter MV1), approximately 12-year-old Minor Victim Two (hereinafter MV2), and approximately 7-year-old Minor Victim Three (hereinafter MV3). In the call, Witness One indicated that MV2 had been sexually assaulted.
4. CPD conducted an interview with MV2 that same day and MV2 informed law enforcement that approximately six months ago, Anthony **SIMS** fondled MV2's breasts and vagina. Over the next four to five months, **SIMS** sexually assaulted MV2, to include penetrating MV2's vagina with his fingers and eventually his penis. MV2 stated that **SIMS** raped her approximately 40-50 times throughout the six-month time frame, and at times would hold MV2's arms down or hold her in place as he sexually assaulted her.
5. Additionally, MV2 reported that **SIMS** would force MV2 to undress and take nude photos of MV2 on a bronzed colored Motorola phone. **SIMS** would force MV2 to pose in different sexual positions and wear lingerie for some of the pictures. According to MV2, **SIMS** would pay her \$5 for every picture he took. MV2 stated **SIMS** then sent her pictures to an unknown female that **SIMS** said was with a modeling agency and he received \$20 proceeds for every picture he sent the unknown female. MV2 reported **SIMS** would get paid through a Cash App account on his phone and subsequently would send the pictures.
6. On July 31, 2020, CPD also conducted an interview with MV1 who resided with **SIMS** during the same time period as MV2. MV1 informed CPD that **SIMS** would penetrate MV1's vagina with his penis. According to MV1, **SIMS** told her not to tell anyone since no

one would believe her. MV1 stated that **SIMS** vaginally penetrated her approximately five times, all when Witness One was at work. According to MV1, **SIMS** would hold her arms down when he penetrated her vaginally and would also force MV1 to undress. When MV1 was nude, **SIMS** would take photos of her and made her pose with stuffed animals or pillows. MV1 informed law enforcement that **SIMS** sold the photos of her that he took and bought her a new phone with the money he made off her. MV1 also reported **SIMS** told her she was a model, and he could make money off the pictures. MV1 reported sometimes **SIMS** would give her some money from the proceeds of the pictures and **SIMS** told her he would send the pictures to an unknown person.

7. On or about August 4, 2020, Witness One took MV1 and MV2 for sexual assault kits and medical follow-ups. Law enforcement learned that MV2 tested positive for chlamydia and gonorrhea. On August 12, 2020, law enforcement received medical records for **SIMS** and learned that on July 7, 2020, **SIMS** had tested positive for chlamydia and gonorrhea, the same two sexually transmitted diseases MV2 had tested positive for on August 4, 2020.
8. In further investigation of **SIMS**, law enforcement learned that **SIMS** was a registered sex offender with convictions out of Michigan. More specifically, **SIMS** was previously convicted on or about February 13, 1991 of violations of Michigan Penal Code section 750.520C1A - Criminal Sexual Conduct – Second Degree (Person Under 13) and 750.520B1A - Criminal Sexual Conduct – First Degree (Person Under 13). On August 24, 2020, an arrest warrant was issued for **SIMS** out of Franklin County, Ohio for three counts of Ohio Revised Code 2907.02 ORC violations of Rape, a felony in the first degree
9. On September 18, 2020, **SIMS** was arrested in Chicago, Illinois on the arrest warrant and extradited back to Columbus, Ohio. At the time he was arrested in Chicago, he was in possession of a Samsung Galaxy A20 that was inventoried with the Chicago Police Evidence Recovery and Property Section.
10. On November 3, 2022, law enforcement received a call from Witness One again. Witness One learned that MV1 made new recent disclosures about what **SIMS** had done to her. More specifically, MV1 disclosed to a counselor that in addition to being raped by **SIMS**, **SIMS** would get MV1 drunk or high and take her to various hotels to force her to have sex with men who paid **SIMS** for the sex acts she engaged in with them. MV1 stated she was forced to have sex with approximately 50 different men.
11. On November 17, 2022, a follow-up forensic interview with conducted with MV1, during which, MV1 confirmed when she was 12-13 years old, **SIMS** would take her to cheap hotels and require MV1 to have sex with men and MV1 suspected **SIMS** received money in exchange. According to MV1, **SIMS** did all the communications on his cell phone with various messaging apps. MV1 believed **SIMS** had two cell phones, both Android phones, and **SIMS** used one phone for taking nude photos of her and setting up the meetings with men at hotels who were mostly with “old white me in their 40’s.” MV1 recalled **SIMS**

would take photographs of her in lingerie, naked, or underwear and would sell them to people. MV1 recalled one-time, **SIMS** told her "We just made \$500." MV1 reported she never received money from the proceeds but would sometimes receive food.

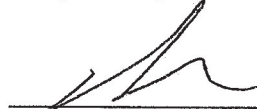
12. As the investigation of **SIMS** continued and expanded, law enforcement obtained the Samsung Galaxy A20 cell phone belonging to **SIMS** from Chicago, Illinois. On November 21, 2022, a search warrant was obtained for that device. A forensic extraction was obtained, and an initial review of that extraction revealed multiple images of MV1 and MV2 wearing lingerie or fully nude, and posed on a bed with their breasts, vaginas, or both exposed. Images were also recovered which depicted MV1 and MV2 engaged in masturbation.
13. Upon further review of the forensic extraction of **SIMS** Samsung Galaxy cell phone, your affiant identified approximately 238 images depicting MV1 in various poses that were sexual in nature, both partially clothed as well as fully nude engaged in acts of masturbation of the lascivious display of her genitalia and pubic region. For example, one image depicted MV1 wearing a light blue lace top pulled down to expose her breast. In the image, MV1 was fully nude from the waist down with her vagina exposed to the camera while laying on a bed. Another image depicted MV1 standing fully nude next to a bed with a bright pink star patterned comforter.
14. In continued forensic review of **SIMS** cell phone, your affiant identified approximately 58 images depicting MV2 in various sexual poses, both partially clothed as well as fully nude. One image depicted MV2 wearing a black lace top and fully nude from the waist down. In the image, MV2's legs were spread open, and her nude vagina exposed to the camera while she was sitting on a bed. A second image depicted MV2 fully nude with her legs spread open and her vagina exposed to the camera while laying down on a bed with a spotted blue patterned comforter.
15. Your affiant identified an additional image from the device that depicted **SIMS** laying on a bed with the same spotted blue patterned comforter as the one depicted in the image described above of MV2. Metadata associated with the image identified the following information revealed a capture date of April 28, 2019 at 5:24:23 AM. The latitude and longitude were also documented which came back to an address in Columbus, Ohio where Witness One, MV1, and MV2 all resided with **SIMS**.
16. Your affiant also identified the Samsung Galaxy phone had a phone number attributed to it which was noted as (317) 480-0021 which was resolved to T-Mobile. On March 21, 2023, a subpoena was served to T-Mobile for all subscriber information associated with the same (317) 480-0021 phone number noted above. T-Mobile responded that the following devices belonged to "Anthony Sins (sic)", which your affiant believes was supposed to read "Anthony **SIMS**":

- SAM A20 32G BLK, IMEI: 352741119116161 – known to your affiant to be a Samsung Galaxy A20
- MOT E5 PLUS 32G BLU, IMEI: 354138093857555 – known to your affiant to be a Motorola Moto E5 Plus¹

CONCLUSION

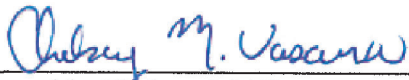
17. Based upon the foregoing, your affiant submits that there is probable cause to believe that Anthony SIMS has committed the violations of 18 U.S.C. §§ 2251(a) and (e) and 2252(a)(4)(B) and (b)(2) - the sexual exploitation of a minor and the possession of child pornography by a person previously convicted of an offense relating to sexual abuse of a minor and 18 U.S.C. § 1591(a)(1) and (b)(1) – sex trafficking of a minor. Therefore, your affiant respectfully requests this court issue a criminal complaint and arrest warrant.

Respectfully submitted,



Josh Saltar
Special Agent
Federal Bureau of Investigation

Subscribed and sworn to before me on the 18th day of September, 2023.



Honorable Chelsey M. Vascara
United States Magistrate Judge
United States District Court
Southern District of Ohio

¹ This cellular phone was never recovered throughout the course of the investigation and its whereabouts are still unknown.